



SOWELL GRAY STEPP & LAFFITTE, LLC  
ATTORNEYS AND COUNSELORS AT LAW

January 16, 2004

VIA HAND-DELIVERY

The Honorable Bruce Duke  
Acting Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: SC PSC Docket No. 2003-327-C  
SGS&L File No. 5671/1500

Dear Mr. Duke:

Enclosed for filing, please find the originals and 11 copies of Competitor Carriers of the South, Inc.'s First Set of Interrogatories and First Requests for Production to WilTel Communications in the referenced Docket. By copy of this correspondence I am serving the same on parties of interest. Please date-stamp the extra copies provided as proof of filing and return them to our courier.

Sincerely,

Robert E. Tyson, Jr.

Enclosures

cc: WilTel Communications  
Parties of record

Robert E. Tyson, Jr.  
rtyson@sowell.com

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Columbia, SC 29211

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**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

DOCKET NO. 2003-327-C

IN RE:

Continued Availability of Unbundled High	)	
Capacity Loops at Certain Locations and	)	<b>COMPETITIVE CARRIERS</b>
Unbundled High Capacity Transport on	)	<b>OF THE SOUTH, INC.'S FIRST</b>
Certain Routes Pursuant to the Federal	)	<b>INTERROGATORIES TO</b>
Communication Commission's Triennial	)	<b>WILTEL COMMUNICATIONS</b>
Review Order	)	
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Competitive Carriers of the South, Inc. ("CompSouth")<sup>1</sup>, hereby serves its First Set of Interrogatories to Wiltel Communications.

**INSTRUCTIONS**

1. Please answer each interrogatory separately and in the order that it is asked. The number of the answer should correspond to the number of the Interrogatory being answered. Following each answer, please identify the person or persons responsible for the answer and indicate what person or witness provided responsive information or documents, and where applicable, what witness will sponsor each answer in testimony.
2. In response to the requests seeking the production of documents, please produce all responsive documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the

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<sup>1</sup> The members of CompSouth include: Access Integrated Networks, Inc., Access Point Inc., MCI, Birch Telecom, Covad Communications Company, AT&T, NewSouth Communications Corp., Talk America, Nuvox Communications, Inc., ITC^DeltaCom, Xspedius Communications, Momentum Business Solutions, Cinergy Communications Company, Network Telephone Corp., KMC Telecom, LecStar Telecom, Inc., Z-Tel Communications, Inc., and IDS Telecom LLC.

categories in this request. If the requested documents are kept in an electronic format, you shall produce the requested documents in such format. If any part of a document is responsive to any request, the whole document is to be produced. If there has been any alteration, modification, or addition to a document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts, revisions or redlines, each such alternation, modification or addition is to be considered a separate document.

3. In response to interrogatories requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Request for Production. Such identification shall contain the number (and subpart, if applicable) of the interrogatory requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall include the author, publisher, title, date, and any "Bates" or other sequential production numbering for the document or item. When responding to the Request for Production, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to "identify for disclosure" in the interrogatories. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the "identification for disclosure".

4. Please produce the requested information at the most granular level you possess. If an interrogatory seeks information at a level more granular than what you possess, please do not object or decline to answer or produce on that basis, but rather, state that you do not possess information at that level and produce the information requested at the most granular

level that you possess. CompSouth is not asking for the creation of brand new data, but is seeking all available data for the specific categories and sub-categories described.

5. Please produce all information requested on any table by filling in the table provided in these Interrogatories. If additional explanation is required, please copy the question and provide your response below.

6. As used in these requests, the singular shall also be treated as plural and vice-versa. If you are unable to respond fully and completely to a document request, you shall explain the reasons why you are unable to do so. The terms defined above and the individual requests for information should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with all applicable rules, including without limitation the Procedural Rules of the South Carolina Public Service Commission.

7. This request is directed to all documents and information in your custody or control. A document is deemed to be in your custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company's present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Interrogatories, you shall produce the document, including all appendices, exhibits, schedules, and attachments.

8. If you are unable to produce a document or information based on a claim that the document is not in your custody or control, state the whereabouts of such document or information when it was last in your possession, custody or control, and provide a detailed

description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

9. These interrogatories are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by your company, then in such case, you should change or modify such answer and submit such changes answer as a supplement to the original answer. Further, should a subsequent version(s) of a document have been created or exist as of the date of this Interrogatory, such version(s) must be produced. Where prior versions or drafts of documents exist, please produce all such documents in your possession, custody or control.

10. CompSouth requests that you answer these Interrogatories under oath or stipulate in writing that its interrogatory responses can be treated exactly as if they were filed under oath.

11. If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more of the following categories, in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or privilege(s), within ten (10) days after receiving these Interrogatories, the attorney asserting the privilege shall:

- (a) identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and

- (b) provide the following information in the objection, unless  
divulgence of such information would cause disclosure of the  
allegedly privileged information:
  - (i) for documents: (1) the type of document; (2) subject matter  
of the document; (3) the date of the document; (4) the  
number of pages in the document; (5) the location or  
custodian of the document; (6) such other information as is  
sufficient to identify the document for a subpoena *duces*  
*tecum*, including, where available, the names(s),  
address(es) and telephone number of the author(s) of the  
document and all recipient(s), and, where not apparent, the  
relationship of the author and addressee to each other;
  - (ii) for oral communications: (1) the name(s), address(es) and  
phone number(s) of the person making the communication  
and the name(s), address(es) and phone number(s) of the  
persons present while the communication was made; (2) the  
relationship of the person(s) present to the person(s)  
making the communication; (3) the date and place of each  
communication; (4) the general subject matter of the  
communication.

12. In the event that any requested information is considered by you to be  
confidential, the attorney asserting such confidential status shall inform counsel for CompSouth  
identified below of this designation as soon as he or she becomes aware of it, but in any event,

prior to the time the responses to the Interrogatories are due to discuss or negotiate a compromise. The confidential documents however, should be produced pursuant to the protective order(s) and/or non-disclosure agreement(s) executed in this proceeding.

13. Answers to these requests for information are to be provided by the date set forth in Order No. 2003-730, issued by the Commission on December 17, 2003. Service of responses, and all notifications, shall be made pursuant to the terms of the Order.

### **DEFINITIONS**

1. "You" and "your" refer to Wiltel Communications as well as any predecessors in interest, parent(s), subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Wiltel Communications.

2. "Affiliates" (affiliated, affiliate) is defined as found in the Telecommunications Act of 1996. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1).

3. "Southeastern states" include the following states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

4. "DS3 transport" refers to transmission facilities with a total digital signal speed of 44,736 Mbps provided over various transmission media including, but not limited to, fiber optics, coaxial cable, wireless, radio, and power line facilities.
5. "DS1 transport" refers to transmission facilities with a total digital signal speed of 1.544 Mbps provided over various transmission media including, but not limited to, copper, fiber optics, coaxial cable, wireless, radio, and power line facilities.
6. "Dark fiber transport" refers to optical transmission facilities without activated electronics, through which no light is transmitted and no signal is carried.
7. "Optronics" refers to equipment, materials, and devices that are attached to dark fiber for the purpose of lighting the fiber to carry a signal to serve customers.
8. "IRU" refers to an indefeasible right of use, or a type of arrangement that conveys a right to use particular facilities for a specified amount of time that cannot be arbitrarily changed or altered.
9. "High capacity" refers to transmission facilities with a total digital signal speed of DS1 or higher.
10. "CLLI code" refers to the Common Language Location Identifier that is an 11-character alphanumeric code that identifies a specific physical location or specific piece of equipment at a physical location.
11. "ILEC CO" refers to BellSouth central offices.



12. "ILEC Wire Center" refers to a BellSouth building housing one or more switches.

### **INTERROGATORIES**

1. Provide copies of all responses you have made to (1) mandatory data requests propounded by the Commission in this docket and (2) all discovery or similar requests (including subpoenas) served by parties to this proceeding. Provide both public and proprietary responses to the requests identified above. If you have already served counsel for CompSouth with such responses, please identify the response and the date such response was served on counsel for CompSouth.

2. Affirm or deny that you have self-provide high capacity transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in the state for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility.

Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

3. Affirm or deny that you offer to carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in the state. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you “own” a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

4. If you answered Question 2 in the affirmative (that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such facilities identifying:

- (a) The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high

alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)

- (b) Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- (c) Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 2).
- (d) If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- (e) Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- (f) Whether you are able to immediately provide transport along the particular route.
- (g) The capacity deployed and the capacity active on the route as of September 30, 2003.

5. If you answered Question 3 in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- (a) The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the “low alpha” (alphabetically first) CLLI code as Wire Center A and the “high alpha” CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- (b) Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- (c) Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 3).
- (d) If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name..
- (e) Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- (f) Whether you are willing and able immediately to provide transport along the particular route.

(g) The capacity deployed and the capacity active on the route as of September 30, 2003.

6. If, in response to Questions 4 and 5, you denied any of the specified characteristics, explain in detail the basis for your response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such limitations.

7. Affirm or deny that you have self-provided high capacity loop or dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in the state for use in your own operations in providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

8. Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in the state. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a

facility if (i) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this response.

9. If you answered Question 7 in the affirmative (that you have self-provided high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, identifying:

- (a) The RSAG valid address of each customer location.
- (b) The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- (c) Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- (d) Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- (e) Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and

riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.

- (f) The capacity deployed and capacity activated to the specific location as of September 30, 2003.

10. If you answered Question 8 in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops identifying:

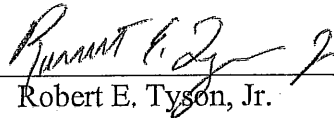
- (a) The RSAG valid address of each customer location.
- (b) The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- (c) Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- (d) Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- (e) Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain

in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.

- (f) Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- (g) The capacity deployed and capacity activated to the specific location as of September 30, 2003.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

By:



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Attorneys for Competitive Carriers of the  
South, Inc. ("CompSouth")

Columbia, South Carolina

January 14, 2004



## CERTIFICATE OF SERVICE

I, the undersigned of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for Competitive Carriers of the South, Inc. ("CompSouth"), do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail or US Mail to the following address(es):

**Pleadings: Competitive Carriers of the South, Inc.'s First Set of Interrogatories to WilTel Communications (Docket No. 2003-327-C)**

WilTel Communications  
One Technology Center  
Tulsa, OK 74103

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South Carolina Public Service Commission  
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The Honorable Bruce Duke  
Acting Executive Director  
South Carolina Public Service Commission  
Post Office Drawer 11649  
Columbia, South Carolina 29211  
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Inc. (ITC^DeltaCom);

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Louanne Horton

January 15, 2004

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

DOCKET NO. 2003-327-C

IN RE:

Continued Availability of Unbundled High  
Capacity Loops at Certain Locations and  
Unbundled High Capacity Transport on  
Certain Routes Pursuant to the Federal  
Communication Commission's Triennial  
Review Order

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**COMPETITIVE CARRIERS  
OF THE SOUTH, INC.'S FIRST  
REQUESTS FOR PRODUCTION  
TO WITEL  
COMMUNICATIONS**

Competitive Carriers of the South, Inc. ("CompSouth")<sup>1</sup>, hereby serves its First Set of Requests for Production to WiTel Communications.

**INSTRUCTIONS**

1. Please respond to each request separately and in the order that it is asked.

The number of the response should correspond to the number of the Request. Following each response, please identify the person or persons responsible for the response and indicate what person or witness provided responsive information or documents, and where applicable, what witness will sponsor each response in testimony.

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produce the requested documents in such format. If any part of a document is responsive to any request, the whole document is to be produced. If there has been any alteration, modification, or addition to a document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts, revisions or redlines, each such alternation, modification or addition is to be considered a separate document.

3. When responding to the Requests for Production, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to “identify for disclosure” in the interrogatories. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

4. Please produce the requested information at the most granular level you possess. If a request seeks information at a level more granular than what you possess, please do not object or decline to answer or produce on that basis, but rather, state that you do not possess information at that level and produce the information requested at the most granular level that you possess. CompSouth is not asking for the creation of brand new data, but is seeking all available data for the specific categories and sub-categories described.

5. As used in these requests, the singular shall also be treated as plural and vice-versa. If you are unable to respond fully and completely to an interrogatory or document request, you shall explain the reasons why you are unable to do so. The terms defined above and the individual requests for information should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with all applicable rules, including without limitation the Procedural Rules of the South Carolina Public Service Commission.

6. This request is directed to all documents and information in your custody or control. A document is deemed to be in your custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company's present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents, you shall produce the document, including all appendices, exhibits, schedules, and attachments.

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- a. identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and
- b. provide the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:
  - (i) for documents: (1) the type of document; (2) subject matter of the document; (3) the date of the document; (4) the number of pages in the document; (5) the location or custodian of the document; (6) such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where available, the names(s), address(es) and telephone number of the author(s) of the document and all recipient(s), and, where not apparent, the relationship of the author and addressee to each other;
  - (ii) for oral communications: (1) the name(s), address(es) and phone number(s) of the person making the communication and the name(s), address(es) and phone number(s) of the persons present while the communication was made; (2) the relationship of the person(s) present to the person(s) making the communication; (3) the date and place of each communication; (4) the general subject matter of the communication.

11. In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform counsel for CompSouth

identified below of this designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to the Requests for Production are due to discuss or negotiate a compromise. The confidential documents, however, should be produced pursuant Commission Order No. 2003-729 and/or non-disclosure agreement(s) executed in this proceeding.

12. Responses to these Requests for Production are to be provided by the date set forth Order No. 2003-730, issued by the Commission on December 17, 2003. Service of responses, and all notifications, shall be made pursuant to the terms of the Order.

### **DEFINITIONS**

1. "You" and "your" refer to WilTel Communications as well as any predecessors in interest, parent(s), subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of WilTel Communications.

2. "Affiliates" (affiliated, affiliate) is defined as found in the Telecommunications Act of 1996. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1).

3. "Southeastern states" include the following states: Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee.

4. "DS3 transport" refers to transmission facilities with a total digital signal speed of 44.736 Mbps provided over various transmission media including, but not limited to, fiber optics, coaxial cable, wireless, radio, and power line facilities.



5. "DS1 transport" refers to transmission facilities with a total digital signal speed of 1.544 Mbps provided over various transmission media including, but not limited to, copper, fiber optics, coaxial cable, wireless, radio, and power line facilities.

6. "Dark fiber transport" refers to optical transmission facilities without activated electronics, through which no light is transmitted and no signal is carried.

7. "Optronics" refers to equipment, materials, and devices that are attached to dark fiber for the purpose of lighting the fiber to carry a signal to serve customers.

8. "IRU" refers to an indefeasible right of use, or a type of arrangement that conveys a right to use particular facilities for a specified amount of time that cannot be arbitrarily changed or altered.

9. "High capacity" refers to transmission facilities with a total digital signal speed of DS1 or higher.

10. "CLLI code" refers to the Common Language Location Identifier that is an 11-character alphanumeric code that identifies a specific physical location or specific piece of equipment at a physical location.

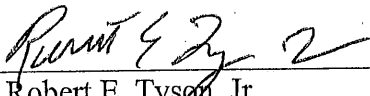
11. "ILEC CO" refers to BellSouth central offices.

12. "ILEC Wire Center" refers to a BellSouth building housing one or more switches.

**REQUESTS FOR PRODUCTION**

1. For each document referred to or identified to in any response to the Interrogatories, please produce.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

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Attorneys for Competitive Carriers of the South, Inc.

Columbia, South Carolina  
January 14, 2004

## CERTIFICATE OF SERVICE

I, the undersigned of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for Competitive Carriers of the South, Inc. ("CompSouth"), do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail or US Mail to the following address(es):

**Pleadings: Competitive Carriers of the South, Inc.'s First Requests For Production to WiTel Communications (Docket No. 2003-327-C)**

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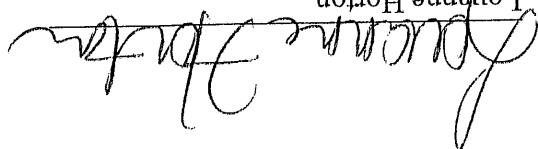
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January 15, 2004

  
Louanne Horton